Virginia Title V Operating Permit

Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	**Keller Manufacturing Company, Inc.**
Facility Name:	**Culpeper Plant**
Facility Location:	**601 Germanna Highway** **Culpeper, Virginia 22701**
Registration Number:	**40170**
Permit Number:	**FSO40170**

June 1, 2001
Effective Date

June 1, 2006
Expiration Date

Dennis H. Treacy
Director, Department of Environmental Quality

Signature Date

Table of Contents, 2 pages
Permit Conditions, 41 pages

Table of Contents

I. FACILITY INFORMATION 4

II. SIGNIFICANT EMISSION UNITS 5

III. FUEL BURNING EQUIPMENT REQUIREMENTS – [UNIT ID #21] 7

A. LIMITATIONS 7
B. MONITORING AND RECORDKEEPING 7
C. TESTING 11

IV. WOODWORKING EQUIPMENT REQUIREMENTS [UNIT ID #'S 17-20] 12

A. LIMITATIONS 12
B. MONITORING AND RECORDKEEPING 12
C. TESTING 14

V. FURNITURE FINISHING EQUIPMENT REQUIREMENTS [UNIT ID #'S 1-16] 15

A. LIMITATIONS 15
B. MONITORING AND RECORDKEEPING 15
C. TESTING 17

VI. FACILITY WIDE MACT CONDITIONS 18

A. LIMITATIONS 18
B. MONITORING 24
C. RECORDKEEPING 25
D. TESTING 27
E. REPORTING 27

VII. INSIGNIFICANT EMISSION UNITS 29

VIII. PERMIT SHIELD & INAPPLICABLE REQUIREMENTS 30

IX. GENERAL CONDITIONS 31

A. FEDERAL ENFORCEABILITY 31
B. PERMIT EXPIRATION 31
C. RECORDKEEPING AND REPORTING 31
D. ANNUAL COMPLIANCE CERTIFICATION 32
E. PERMIT DEVIATION REPORTING 33
F. FAILURE/MALFUNCTION REPORTING 33
G. SEVERABILITY 33
H. DUTY TO COMPLY 33
I. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE 34
J. PERMIT ACTION FOR CAUSE 34
K. PROPERTY RIGHTS 35
L. DUTY TO SUBMIT INFORMATION 35
M. DUTY TO PAY PERMIT FEES 35
N. FUGITIVE DUST EMISSION STANDARDS 35
O. STARTUP, SHUTDOWN, AND MALFUNCTION 36
P. ALTERNATIVE OPERATING SCENARIOS 36
Q. INSPECTION AND ENTRY REQUIREMENTS 36
R. REOPENING FOR CAUSE 37
S. PERMIT AVAILABILITY 37

T. Transfer of Permits 37
U. Malfunction as an Affirmative Defense 38
V. Operation Reduction or Facility Shutdown 38
W. Permit Revocation or Termination for Cause 39
X. Duty to Supplement or Correct Application 39
Y. Stratospheric Ozone Protection 39
Z. Accidental Release Prevention 39
AA. Changes to Permits for Emissions Trading 39
BB. Emissions Trading 39

X. STATE-ONLY ENFORCEABLE REQUIREMENTS 41

I. Facility Information

Permittee
Keller Manufacturing Company, Inc.
P. O. Box 280
Culpeper, Virginia 22701

Responsible Official
David Jenkins
V. P. Engineering

Facility
Culpeper Plant
601 Germanna Highway
Culpeper, Virginia 22701

Contact Person
David Obenshain
Plant Engineer
(540) 825-1201

AIRS Identification Number: 51-047-0008

Facility Description: SIC Code 2511 - Manufacture of solid wood dining and bedroom furniture. Manufacturing activities at this facility include, lumber drying, woodworking operations, gluing, furniture finishing and steam generation from a wood/coal-fired boiler.

II. Significant Emission Units

Significant Emission Units to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment Subject to 9 VAC 5 Chapter 40 (Existing Sources)							
21	21	Keeler Class CP Model # 14421 wood/coal-fired boiler (1966)	47.8 x 10^6 Btu/hr (heat input)	Zurn multiclone cyclone with flyash reinjection (1966)	PCD-21	Particulate Matter	None
Woodworking Equipment Subject to 9 VAC 5 Chapter 40 (Existing Sources)							
17	17	Woodworking operations (1966)	50,264 CFM	Pneumafil Model 13.5-460-10 Baghouse #4	PCD-17	Particulate Matter	None
18	18	Woodworking operations (1966)	50,264 CFM	Pneumafil Model 13.5-460-10 Baghouse #3	PCD-18	Particulate Matter	None
19	19	Woodworking operations (1966)	23,000 CFM	Pneumafil Model 13.5-460-10 Baghouse #2	PCD-19	Particulate Matter	None
20	20	Woodworking operations (1966)	23,000 CFM	Pneumafil Model 13.5-460-10 Baghouse #1	PCD-20	Particulate Matter	None
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 40 (Existing Sources) and 40 CFR 63 Subpart JJ (Existing Sources)							
1	1	Chair line stain booth No. 1 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-1	Particulate Matter	None
2	2	Chair line stain booth No. 2 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-2	Particulate Matter	None
3	3	Chair line sealer booth (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-3	Particulate Matter	None
4	4	Chair line glaze booth (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-4	Particulate Matter	None
5	5	Chair line topcoat booth No. 1 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-5	Particulate Matter	None

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
6	6	Chair line topcoat booth No. 2 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-6	Particulate Matter	None
7	7	Chair line topcoat booth No. 3 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-7	Particulate Matter	None
8	8	Chair line utility booth (1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-8	Particulate Matter	None
9	9	Case & table stain booth No. 1 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-9	Particulate Matter	None
10	10	Case & table stain booth No. 2 (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-10	Particulate Matter	None
12	12	Case & table sealer booth No. 2 (1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-12	Particulate Matter	None
13	13	Case & table glaze booth (DeVilbiss 1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-13	Particulate Matter	None
14	14	Case & table topcoat booth No. 1 (1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-14	Particulate Matter	None
15	15	Case & table topcoat booth No. 2 (1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-15	Particulate Matter	None
16	16	Sandroom spray booth (1966)	7.5 gallons/hr	Replacement fiberglass filters	PCD-16	Particulate Matter	None
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 50 (New/Modified Sources) and 40 CFR 63, Subpart JJ (Existing Sources)							
11	11	Case & table sealer booth No. 1 (1987)	7.5 gallons/hr	Replacement fiberglass filters	PCD-11	Particulate Matter	None
Furniture Gluing Operations Subject to 9 VAC 5 Chapter 40 (Existing Sources) and 40 CFR 63, Subpart JJ (Existing Sources)							
G-1	-	Gluing operations	-	None	-	-	None

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Fuel Burning Equipment Requirements – [Unit ID #21]

A. Limitations

1. Particulate matter (PM) emissions from the Keeler Boiler [ID #21] shall be controlled by the use of a multicyclone with a rated PM collection efficiency of ninety-two percent. The multicyclone shall be operated at all times the boiler is in use.
(9 VAC 5-80-110)

2. The approved fuels for the Keeler Boiler [ID #21] are coal and wood, including wood waste materials generated on-site from the manufacturing processes with SIC 2511. A change from the approved fuels may require a permit to modify and operate.
(9 VAC 5-80-110)

3. Emissions from the operation of the Keeler Boiler [ID #21] shall not exceed the limits specified below:

Particulate Matter	0.4 lbs/10^6 Btu	19.1 lbs/hr
Sulfur Dioxide	126.2 lbs/hr	

(9 VAC 5-40-900, 9 VAC 5-40-930, and 9 VAC 5-80-110)

4. Visible emissions from the Keeler Boiler [ID #21] stack shall not exceed 20 percent opacity except for one six-minute period in any one hour of not more than 60 percent opacity. The opacity standard prescribed under this permit condition shall apply at all times except during periods of boiler startup, shutdown and malfunction. Failure to meet the requirement of this permit condition because of water vapor shall not be a violation of this requirement.
(9 VAC 5-40-940, 9 VAC 5-40-20, and 9 VAC 5-80-110)

5. The Keeler Boiler [ID #21] emissions shall be controlled by proper operation and maintenance. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum.
(9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. The multicyclone [PCD-21] shall be equipped with a device to continuously measure and indicate airflow or static pressure drop across the multicyclone. The device shall be installed, maintained, calibrated and operated in accordance with approved procedures that shall include, as a minimum, the manufacturer's written requirements or recommendations. The device shall be installed and operational prior to conducting the performance test under Condition III.C.1 of this permit. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation and calibration of the device. The device shall be provided with adequate access for inspection and shall be in operation whenever the Keeler Boiler [ID #21] is in

operation, once the monitoring device is installed in accordance with this condition. The monitoring device shall be checked weekly when the Keeler Boiler [ID #21] is in operation, with the air flow or static pressure drop measurement for the multicyclone [PCD-21] noted in a log. If the readings noted are abnormal, the permittee shall investigate the cause, and initiate appropriate corrective action.
(9 VAC 5-80-110)

2. An annual inspection (internal and external) shall be conducted on the Keeler Boiler's multicyclone [PCD-21] by the permittee to insure structural integrity. The permittee shall record:

   a. The date of each inspection;

   b. The results of each inspection; and

   c. The maintenance performed, if required.

   (9 VAC 5-80-110)

3. The permittee shall obtain a certification from the fuel supplier for each shipment of coal received at the facility. Each fuel supplier certification shall include the following, at a minimum:

   a. The name of the coal supplier;

   b. The date on which the coal was received;

   c. The quantity (in tons) of coal received; and

   d. The sulfur content, moisture content, ash content and heat content of the coal.

   (9 VAC 5-80-110)

4. The permittee shall measure, monitor and record the following with respect to firing coal, wood and wood waste in the Keeler Boiler [ID #21]:

   a. The dates and period of times of coal feed to the boiler;

   b. The hourly quantity (in pounds) and sulfur content of coal feed to the boiler during each time period of coal feeding; and

   c. The quantity (in pounds per hour) of sulfur dioxide emissions from the boiler, calculated every hour during each time period of coal feeding, using the following equation:

      $SO_2 = Q_{coal} * S_{coal} * 2$

      where,
      SO_2 = sulfur dioxide emissions, lb/hr,
      Q_{coal} = hourly quantity of coal feed to the boiler, lb/hr
      S_{coal} = sulfur content of coal fed to the boiler, (weight fraction)
      2 = Maximum theoretical factor for sulfur to sulfur dioxide conversion.

d. The annual (i.e., calendar year) quantity of coal and wood/wood waste combusted in the boiler during each calendar year of the effective term of this permit.

(9 VAC 5-80-110)

5. The permittee shall conduct daily visual emission inspections on the Keeler Boiler [ID #21] stack exhaust during daylight hours and when the boiler is operating under conditions which the permittee defines as representative performance of the boiler. Operation during periods of startup, shutdown and malfunction shall not constitute representative conditions for the visual emission inspections. Visual inspections shall consist of a visual survey of the stack exhaust over a minimum 2-minute period to identify if there are any visible emissions, other than condensed water vapor. If there are no visible emissions observed during this period, record this fact and no further action is necessary for this particular daily inspection. If any visible emissions, other than condensed water vapor, are observed, the permittee shall:

   a. Verify that the equipment and control device causing the visible emissions are operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment and control device are operating properly, the permittee shall conduct a visible emission evaluation (VEE) using a certified observer in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six (6) minutes. If the average opacity of the emissions exceed twenty percent (20%) during any six (6) minute period of the observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately for a consecutive sixty (60) minute period to determine compliance with Condition III.A.4. Proceed with action in Condition III.B.5.c. If the equipment or control device is not operating properly, the permittee shall take corrective action(s) immediately and proceed with action in Condition III.B.5.b of this permit.

   b. Conduct a visible emission evaluation (VEE) using a certified opacity reader in accordance with Method 9 (40 CFR Part 60, Appendix A) for a minimum of six (6) minutes if the corrective action(s) taken in (a) does not eliminate all visible emissions within 24 hours. Conduct such a test at least once each daylight shift until corrective action(s) taken allows the boiler and the control device to operate properly. If corrective action allows the boiler and the control device to operate properly, but any visible emissions are still observed, the permittee shall conduct a VEE in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six (6) minutes. If the average opacity of the emissions exceed twenty percent (20%) during any six (6) minute period of observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately for a consecutive sixty (60) minute period to determine compliance with Condition III.A.4. Proceed with action in Condition III.B.5.c.

   c. Record the daily results of visible emission inspections, the substance of any corrective action and the results of all visible emission evaluations conducted in accordance with Method 9 (40 CFR Part 60, Appendix A).

   (9 VAC 5-80-110)

6. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the DEQ, Fredericksburg Satellite Office. These records shall include, but are not limited to:

   a. The Keeler Boiler multicyclone [PCD-21] air flow/static pressure drop monitoring device's manufacturer's recommendations on installation, maintenance, calibration and operation and the results of maintenance and calibration of this monitoring device;

   b. The values (i.e., range) of the normal air flows or static pressure drops for the multicyclone [PCD-21], as established by the equipment manufacturer;

   c. The log of the weekly air flow or static pressure drop readings for the multicyclone [PCD-21] as required in Condition III.B.1;

   d. The log of the annual inspections for the multicyclone [PCD-21], required in Condition III.B.2;

   e. Coal supplier certifications for all coal shipments purchased, required in Condition III.B.3;

   f. Coal feed data and sulfur dioxide emission data, pursuant to Condition III.B.4;

   g. The annual quantity (in pounds or tons) of fuel, segregated by type of fuel (i.e., wood, wood waste and coal), consumed by the Keeler Boiler [ID #21] during each calendar year of the effective term of this permit;

   h. The approximate "as-fired" heat content (in Btu per pound) of the wood/wood waste permitted for the Keeler Boiler [ID #21]; and

   i. The log of daily visible emission inspections, including corrective actions taken and the results of all visible emission evaluations conducted on the Keeler Boiler [ID #21] exhaust stack pursuant to Condition III.B.5;

   j. Copy of certificate(s) of certified opacity observer(s);

   k. The relevant and appropriate pollutant-specific emission factors and the equations relied upon for the purpose of calculating actual emission rates; and

   l. The results of all emission testing conducted (i.e., tests required by this permit and other emission tests requested by the DEQ or initiated by the permittee).

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-80-110)

7. The permittee shall maintain records of the required boiler and boiler equipment operator training including a statement of time, place and nature of training provided. The permittee shall have available good written operating procedures and a maintenance schedule for the boiler(s). These procedures shall be based on the manufacturer's recommendations, at minimum. All records required by this condition shall be kept on site and made available for inspection by the DEQ.
(9 VAC 5-80-110)

C. Testing

1. As part of the periodic monitoring requirement set forth in 9 VAC 5-80-110.E of State Regulations, initial source emission tests shall be conducted on the Keeler Boiler [ID #21] exhaust for particulate matter to determine compliance with the emission limits contained in Condition III.A.3 of this permit. The initial source emission tests shall be performed no later than 120 days from the effective date of this permit. Source emission tests in accordance with the procedures for the initial source emission test shall not normally be required any more frequently than once per every two years. Initial source emission tests and subsequent source emission tests shall be conducted and data reported in accordance with the Source Test Report Format attached with this permit, 9 VAC 5-40-30 of State Regulations. The details of the initial source emission or subsequent source emission tests are to be arranged with the DEQ, Fredericksburg Satellite Office. The permittee shall submit a test protocol at least 30 days prior to testing. Two copies of the test results shall be submitted to the DEQ, Fredericksburg Satellite Office within 60 days after test completion.
(9 VAC 5-40-30 and 9 VAC 5-80-110 K of State Regulations)

2. For the testing required in Condition III.C.1 and other testing that may be conducted to determine compliance with the emission limitations contained in Section III.A of this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
Sulfur Dioxide	EPA Method 6
Particulate Matter (concentration)	EPA Method 5, 17
Particulate Matter (emission rates)	EPA Method 19
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

3. The permittee shall use the unit-specific emission factor developed during the most recent testing required or conducted in accordance with Part III.C of this permit for future emission calculations of the Keeler Boiler [ID #21] required by this permit.
(9 VAC 5-80-110)

IV. Woodworking Equipment Requirements [Unit ID # 's 17, 18, 19 and 20]

A. Limitations

1. Particulate matter emissions from the woodworking equipment [ID #'s 17, 18, 19 and 20] shall be collected using adequate ductwork and properly designed collectors. The collected particulate matter emissions from this equipment shall be controlled by fabric filter baghouses [PCD 17, 18, 19 and 20]. The baghouses shall be operated and maintained at all times when the woodworking equipment and the associated dust collection system are in use. The baghouses shall be provided with adequate access for inspection.
(9 VAC 5-40-2270.A and 9 VAC 5-80-110)

2. Particulate matter emissions from each exhaust of PCD 17, 18, 19 and 20 shall not exceed 0.05 grains per standard cubic feet of exhaust gas.
(9 VAC 5-40-2270.B, 9 VAC 5-50-10D and 9 VAC 5-80-110)

3. Visible emissions from each exhaust of PCD 17, 18, 19 and 20 shall not exceed twenty (20) percent opacity, except for one six-minute period in any one hour of not more than thirty (30) percent opacity. Failure to meet the opacity standards in this condition because of the presence of water vapor shall not be a violation of this condition. The opacity standards prescribed under this condition shall apply at all times except during periods of startup, shutdown and malfunction.
(9 VAC 5-50-80 and 9 VAC 5-80-110)

4. All subsequent transfer of the collected material from the woodworking equipment fabric filter baghouses [PCD 17, 18, 19, and 20] shall be controlled by completely enclosed transfer systems. The enclosed transfer system shall be maintained at all times when the baghouses and the cyclone are in use.
(9 VAC 5-50-90 and 9 VAC 5-80-110)

5. The permittee shall take reasonable precautions to prevent particulate matter from any wood/wood waste stockpiles from becoming airborne. Such reasonable precautions may include, but are not limited to the application of asphalt, oil, water or suitable chemicals on the wood/wood waste stockpiles and/or enclosure.
(9 VAC 5-50-90 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping

1. Each fabric filter baghouse [PCD 17, 18, 19 and 20] shall be equipped with a device to continuously measure and indicate the differential pressure across the fabric filters. The devices shall be installed in an accessible location and shall be maintained by the permittee in proper working order at all times. The monitoring devices shall be checked weekly when the baghouses are in operation and venting to the atmosphere, with differential pressure readings for each baghouse noted in a log. If the readings noted are abnormal, the permittee shall investigate the cause, which may include an inspection of the bags of the affected baghouse. All defective bags shall be replaced.
(9 VAC 5-40-40, 9 VAC 5-50-40 and 9 VAC 5-80-110)

2. The permittee shall conduct daily visual emission inspections on the exhaust of each wood working equipment pollution control device [PCD 17, 18, 19 and 20] during daylight hours when venting to the atmosphere and when the woodworking equipment and associated control device are operating under conditions which the permittee defines as representative performance of such equipment. Operation during periods of startup, shutdown and malfunction shall not constitute representative conditions for the visual emission inspections. Visual inspections shall consist of a visual survey of the exhausts over a minimum 2-minute period to identify if there are any visible emissions, other than condensed water vapor. If there are no visible emissions observed during this period, record this fact and no further action is necessary for this particular daily inspection. If any visible emissions, other than condensed water vapor, are observed, the permittee shall:

   a. Verify that the equipment and control device causing the visible emissions are operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment and control device are operating properly, the permittee shall conduct a visible emission evaluation (VEE) using a certified observer in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six (6) minutes. If the average opacity of the emissions exceed twenty percent (20%) during any six (6) minute period of the observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately for a consecutive sixty (60) minute period to determine compliance with Condition IV.A.3. Proceed with action in Condition IV.B.2.c. If the equipment or control device is not operating properly, the permittee shall take corrective action(s) immediately and proceed with action in Condition IV.B.2.b of this permit.

   b. Conduct a visible emission evaluation (VEE) using a certified opacity reader in accordance with Method 9 (40 CFR Part 60, Appendix A) for a minimum of six (6) minutes if the corrective action(s) taken in (a) does not eliminate all visible emissions within 24 hours. Conduct such a test at least once each daylight shift until corrective action(s) taken allows the affected equipment and the associated control device to operate properly. If corrective action allows the equipment and the control device to operate properly, but any visible emissions are still observed, the permittee shall conduct a VEE in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six (6) minutes. If the average opacity of the emissions exceed twenty percent (20%) during any six (6) minute period of observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately for a consecutive sixty (60) minute period to determine compliance with Condition IV.A.3. Proceed with action in Condition IV.B.2.c.

   c. Record the daily results of visible emission inspections, the substance of any corrective action and the results of all visible emission evaluations conducted in accordance with Method 9 (40 CFR Part 60, Appendix A).

   (9 VAC 5-80-110)

3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of

such records shall be arranged with the DEQ, Fredericksburg Satellite Office. These records shall include, but are not limited to:

a. The annual quantity of wood dust/wood waste generated from the woodworking operations [ID #'s 17, 18, 19 and 20] during each calendar year of the effective term of this permit. The quantity of wood dust/wood waste may be estimated as a percentage of the raw wood material provided that the annual (i.e., calendar year) throughput records of raw wood material (board feet or tons of wood) are maintained.

b. Values of normal pressure drop readings for each baghouse [PCD 17, 18, 19 and 20].

c. The log of weekly differential pressure readings across the fabric filter baghouses [PCD 17, 18, 19 and 20] as required in Condition IV.B.1.

d. Inspection records as required by Condition IV.B.2.

e. Copy of certificate(s) of certified opacity observer(s).

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(9 VAC 5-50-50 and 9 VAC 5-80-110)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM-10	EPA Method 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

V. Furniture Finishing Equipment Requirements [ID #'s 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16]

A. Limitations (Additional Limitations listed under Section VI of this Permit)

1. Particulate matter emissions from all the spray booths [ID #'s 1 through 16] shall be controlled by fiberglass filters or equivalent. The filters shall be properly placed and maintained whenever the spray booths are in use.
(9 VAC 5-80-110 and Condition 7 of 6/24/99 minor NSR permit)

2. Volatile organic compound (VOC) emissions from the Case & Table Sealer Booth No. 1 [ID #11] shall not exceed 15 tons per year, calculated monthly as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110, Condition 4 of 6/24/99 minor NSR permit, and 9 VAC 5-50-80)

3. Visible emissions from the Case & Table Sealer Booth No. 1 [ID #11] shall not exceed five percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed ten percent opacity as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-80-110 and Condition 8 of 6/24/99 minor NSR permit)

4. Visible emissions from spray booths, [ID #'s 1 through 10 and 12 through 16], shall not exceed 20 percent opacity, except for one six-minute period in any one hour of not more than 60 percent opacity as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-40-80 and 9 VAC 5-80-110)

B. Monitoring and Recordkeeping (Additional Requirements listed under Section VI of this Permit)

1. The permittee shall perform daily inspections of all spray booth filters [PCD 1 through 16] to examine the placement, integrity and particle loading of the filters. The daily inspections for a particular spray booth filter system are only required when the particular spray booth is in operation during any part of the affected calendar day. A log of the daily inspections shall be maintained in which the following are recorded:

   a. The date of the inspection;

   b. The condition of the particular spray booth filter system; and

   c. Any corrective action taken on a particular spray booth filter system.

   (9 VAC 5-80-110)

2. The permittee shall conduct weekly visual emission inspections on the exhaust of each spray booth [ID #'s 1 through 16] during daylight hours and when the spray

booths and associated control devices are operating under conditions which the permittee defines as representative performance of such equipment. Operation during periods of startup, shutdown and malfunction shall not constitute representative conditions for the visual emission inspections. Visual inspections shall consist of a visual survey of the exhausts over a minimum 2-minute period to identify if there are any visible emissions, other than condensed water vapor. If there are no visible emissions observed during this period, record this fact and no further action is necessary for this particular weekly inspection. If any visible emissions, other than condensed water vapor, are observed, the permittee shall:

a. Verify that the equipment and control device causing the visible emissions are operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment and control device are operating properly, the permittee shall conduct a visible emission evaluation (VEE) using a certified observer in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six (6) minutes. If the average opacity of the emissions from any of the spray booths [ID #'s 1 through 10 and 12 through 16] exceed twenty percent (20%) or the opacity of emissions from spray booth [ID #11] exceeds five percent (5%) during any six (6) minute period of the observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately on the affected spray booth exhaust(s) for a consecutive sixty (60) minute period to determine compliance with the applicable opacity limit prescribed in Condition V.A.3 or V.A.4. Proceed with action in Condition V.B.3.c. If the equipment or control device is not operating properly, the permittee shall take corrective action(s) immediately and proceed with action in Condition V.B.2.b of this permit.

b. Conduct a visible emission evaluation (VEE) using a certified opacity reader in accordance with Method 9 (40 CFR Part 60, Appendix A) for a minimum of six (6) minutes if the corrective action(s) taken in (a) does not eliminate all visible emissions within 24 hours. Conduct such a test at least once each daylight shift until corrective action(s) taken allows the affected equipment and the associated control device to operate properly. If corrective action allows the equipment and the control device to operate properly, but any visible emissions are still observed, the permittee shall conduct a VEE in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six (6) minutes. If the average opacity of the emissions from any of the spray booths [ID #'s 1 through 10 and 12 through 16] exceed twenty percent (20%) or the opacity of emissions from spray booth [ID #11] exceeds five percent (5%) during any six (6) minute period of observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately on the affected spray booth exhaust(s) for a consecutive sixty (60) minute period to determine compliance with the applicable opacity limit prescribed in Condition V.A.3 or V.A.4. Proceed with action in Condition V.B.2.c.

c. Record the weekly results of visible emission inspections, the substance of any corrective action and the results of all visible emission evaluations conducted in accordance with Method 9 (40 CFR Part 60, Appendix A).

(9 VAC 5-80-110)

3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the DEQ, Fredericksburg Satellite Office. These records shall include, but are not limited to:

   a. Monthly and annual throughput of coatings and thinner solvents (including any clean-up solvents) in spray booth [ID #11]. Annual throughput shall be calculated monthly as the sum of each consecutive twelve (12) month period;

   b. Monthly and annual emission calculations (using material balances and certified product data sheet information) of volatile organic compounds and volatile hazardous air pollutants from spray booth [ID #11]. Annual emission calculations shall be calculated monthly as the sum of each consecutive twelve (12) month period;

   c. Annual throughput of coatings and thinner solvents (including any clean-up solvents) in spray booths [ID #'s 1 through 10 and 12 through 16]. Annual throughput shall be calculated for each calendar year of the effective term of this permit.

   d. Annual emission calculations (using material balances and certified product data sheet information) of volatile organic compounds and volatile hazardous air pollutants from spray booths [ID #'s 1 through 10 and 12 through 16]. Annual emission calculations shall be performed for each calendar year of the effective term of this permit;

   e. The inspection records as required by Condition V.B.1 and V.B.2.

   (9 VAC 5-80-110)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
Coating Volatile Matter Content	40 CFR Part 60, Appendix A, EPA Method 24
Coating VHAP Matter Content	40 CFR Part 63, Appendix A, EPA Method 311
Visible Emission	40 CFR Part 60, Appendix A, EPA Method 9

(9 VAC 5-80-110)

VI. Facility Wide MACT Conditions

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJ. The permittee is also obligated to comply with the requirements of 40 CFR Part 63, Subpart A as identified in Table 1 for Subpart JJ. A current (1999) copy of 40 CFR Part 63 Subpart JJ, including Tables 1 through 6 to Subpart JJ, is attached with this permit. The following terms and conditions are from 40 CFR Part 63, Subpart JJ. As used in this section, all terms shall have the meaning as defined in 40 CFR §63.2 and 40 CFR §63.801. Note: 40 CFR Part 63, Subpart JJ allows for the use of a control device(s) for compliance purposes. The permittee has indicated that the use of control device(s) was not the method chosen to comply with this MACT. Therefore, for conciseness, MACT terms and conditions identified as potentially pertaining only to control devices have not been included in this permit.

A. Limitations

1. Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits:

    a. For finishing operations, use any of the following methods:

        (1) Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids, as applied;

        (2) Use compliant finishing materials that meet the following specifications:

            (a) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

            (b) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

            (c) Each thinner contains no more than 10.0 percent HAP by weight except where excluded by (e) of this sub-section. For purposes of calculating thinner content of this section, VHAP equals HAP;

            (d) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;

            (e) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent HAP by weight;

        (3) Use any combination of averaging and compliant coatings such that no greater than 1.0 lb of VHAP being emitted per lb of solids used;

b. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied;

c. Compliant contact adhesives shall be used based on the following criteria:

(1) For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;

(2) For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids, as applied; and

(3) For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids, as applied.

(9 VAC 5-170-160, 9 VAC 5-80-110, 40 CFR 63.802, and Condition 5 of 6/24/99 minor NSR permit)

2. The permittee shall develop and implement the following work practice standards:

a. Work practice implementation plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Conditions b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the DEQ upon request. If the DEQ determines that the work practice implementation plan does not adequately address each of the topics specified in 40 CFR 63.803 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the DEQ may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

b. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of 40 CFR Part 63 Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;

(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

c. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

(2) An inspection schedule;

(3) Methods for documenting the date and results of each inspection and any repairs that were made;

(4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(a) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(b) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

d. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:

(1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801;

(2) The number of pieces washed off, and the reason for the washoff; and

(3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

e. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.

f. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

g. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

h. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

(1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

(2) For touchup and repair under the following conditions:

(a) The touchup and repair occurs after completion of the finishing operation; or

(b) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

(3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

(4) When emissions from the finishing application station are directed to a control device;

(5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

(6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic unfeasibility by submitting, to the DEQ, a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic unfeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic unfeasibility:

(a) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(b) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

i. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

j. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

k. Washoff operations - The permittee shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

l. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of 40 CFR Part 63 Subpart JJ that are being used in finishing operations;

(2) Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by 40 CFR 63.803 (l)(2). For VHAPs that do not have a baseline, one will be established according to Condition (6) below.

(3) Tracks the annual usage of each VHAP identified in (l)(1), above, that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If the annual usage of the VHAP identified exceeds its baseline level, then the permittee shall provide a written notification to the DEQ, Fredericksburg Satellite Office, that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(a) The exceedance is no more than 15.0 percent above the baseline level;

(b) Usage of the VHAP is below the de minimis level presented in Table 5 of 40 CFR Part 63 Subpart JJ for that VHAP;

(c) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(d) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.

(5) If none of the explanations listed in (4) above are the reason for the increase, the permittee shall confer with the DEQ, Fredericksburg Satellite Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the DEQ, Fredericksburg Satellite Office and the owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce the usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If the permittee uses a VHAP of potential concern listed in Table 6 of 40 CFR Part 63 Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of 40 CFR Part 63 Subpart JJ for that chemical, then the permittee shall provide an explanation to the DEQ, Fredericksburg Satellite Office, that documents the reason for the exceedance of the de minimis level. If the explanation is not one of those listed in (4) above, the affected source shall follow the procedures established in (5) above.

(9 VAC 5-170-160, 9 VAC 5-80-110, and 40 CFR 63.803(a)-(l))

3. The permittee shall meet the following operation and maintenance requirements:

a. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

b. Malfunctions shall be corrected as soon as practicable after their occurrence.

c. Operation and maintenance requirements established pursuant to section 112 of the Clean Air Act that are enforceable independent of emissions limitations or other requirements in relevant standards.

d. Determination of whether operation and maintenance procedures are being used will be based on information available to the DEQ which may included, but is not limited to, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-170-160, 9 VAC 5-80-110, and 40 CFR 63.6(e))

B. Monitoring

Continuous compliance with the VHAP emissions limits shall be determined as follows:

1. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The facility is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + ... + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + ... \ S_nW_n)/(M_{c1} + M_{c2} + ... + M_{cn}) \text{ ..} \qquad \text{Equation 1}$$

where
E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.
M_c = the mass of solids in a finishing material or coating (c) used monthly, including exempt finishing materials and coatings, lb solids/month.
C_c = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.
S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.
W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month (M_c in lb solids / month) multiplied by the VHAP content in each material (C_c in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month (M_c in lb solids / month).

2. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and

submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition VI.A.1, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

3. For contact adhesive operations when compliant adhesives are being used to show compliance, the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

4. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.

5. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the DEQ may require the permittee to modify the plan (see Condition VI.A.2.a).

(9 VAC 5-170-160, 9 VAC 5-80-110, and 40 CFR 63.804(g) & 40 CFR 63.8)

C. Recordkeeping

The permittee shall maintain records of the following:

1. For emission limit purposes, the permittee shall maintain the following:

   a. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Condition VI.A.1;

   b. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Conditions VI.A.1.a and VI.A.1.c; and

   c. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Condition VI.A.1.b.

2. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1 (as defined in Condition VI.B.1).

3. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

   a. Records demonstrating that the operator training program required by Condition VI.A.2.b is in place;

   b. Records collected in accordance with the inspection and maintenance plan required by Condition VI.A.2.c;

   c. Records associated with the cleaning solvent accounting system required by Condition VI.A.2.d;

   d. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Condition VI.A.2.h;

   e. Records associated with the formulation assessment plan required by Condition VI.A.2.l; and

   f. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

4. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.

5. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.

6. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

(9 VAC 5-170-160, 9 VAC 5-80-110, and 40 CFR 63.806 & 63.10(b)(1))

D. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
Volatile Hazardous Air Pollutants (VHAPs)	40 CFR Part 63, Appendix A, EPA Method 311
Solids Content & Density of Coatings	40 CFR Part 60, Appendix A, EPA Method 24

(9 VAC 5-80-110)

E. Reporting

1. Each time a notification of compliance status is required (see Condition IX.D), the permittee shall submit to the DEQ, Fredericksburg Satellite Office, a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with 40 CFR Part 63 Subpart JJ. The notification shall list:

   a. The methods that were used to determine compliance;

   b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

   c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

   d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;

   e. An analysis demonstrating whether the facility is a major source or an area source (using the emissions generated for this notification);

   f. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

   Copies of each notification shall be sent to:

   U. S. EPA Region III
   Air Protection Division (3AP00)
   ATTN: Wood Furniture NESHAP Coordinator
   1650 Arch Street
   Philadelphia, PA 19103 - 2029

   (9 VAC 5-170-160, 9 VAC 5-80-110, and 40 CFR 63.9(h))

2. Reporting and notification not otherwise required by this permit shall consist of the following:

   a. The permittee when demonstrating continuous compliance shall submit a report covering the previous six (6) months of wood furniture manufacturing operations (see Condition IX.C.3):

      (1) Reports shall be submitted no later than **March 1** and **September 1** of each calendar year.

      (2) The semiannual reports shall include the information required by Condition VI.B, a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.

   b. The permittee, when required to provide a written notification by Condition VI.A.2.l.(4) for exceedance of a baseline level [40 CFR 63.803(1)(4)], shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

   c. Written notification if the permittee chooses to install a control device(s) to comply with 40 CFR Part 63, Subpart JJ, postmarked not less than 30 calendar days prior to such installation.

   Copies of reports in a. and b. above shall be submitted to the U.S. Environmental Protection Agency at the address given in Condition VI.E.1.

   (9 VAC 5-170-160, 9 VAC 5-80-110, and 40 CFR 63.807 & 63.10(d))

VII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
K-1	Dry Kiln #1 (#3)	9 VAC 5-80-720 B	VOCs	-
K-2	Dry Kiln #2 (#4)	9 VAC 5-80-720 B	VOCs	-
K-3	Dry Kiln #3 (#5)	9 VAC 5-80-720 B	VOCs	-
K-4	Dry Kiln #4 (#6)	9 VAC 5-80-720 B	VOCs	-
VF-1	Tempering Room Vents	9 VAC 5-80-720 B	VOCs	-

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting has been prescribed for these emission units.

VIII. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements that have been specifically identified as being not applicable to this permitted facility (or portion of it):

Citation	Title of Citation	Description of Applicability
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Applicable to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 million Btu per hour or less, but greater than or equal to 10 million Btu per hour.
9 VAC 5-40-260	Standard for Particulate Matter (AQCR 1-6)	Applicable to process operations with a process weight capacity greater than 100 pounds per hour and in general do not apply to affected facilities subject to emission standards in 9 VAC 5 Chapter 40 (among other applicability criteria)
40 CFR Part 64	Compliance Assurance Monitoring (CAM)	Applicable to a pollutant-specific emissions unit at a major source required to obtain a Title V permit and satisfies the following criteria: 1: Subject to a pollutant emission standard/limitation, 2: A control device is used to achieve compliance with the standard/limitation, and 3: Potential pre-control device emissions of greater than 100 tons per year for the pollutant.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

IX. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit shall become invalid five years from the date of issuance. The permittee shall submit an application for renewal of this permit no earlier than 18 months and no later than six months prior to the date of expiration of this permit. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the DEQ on the renewal application.
(9 VAC 5-80-110 D and 9 VAC 5-80-80 F)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

(1) Exceedance of emissions limitations or operational restrictions;

(2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The identification of the methods or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required under this permit. If necessary, the owner or operator shall also identify any other material information that must be included in the certification to comply with section 113(c) of the federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information.

4. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition IX.D.3 of this permit. The certification shall identify each deviation and take it into

account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred.

5. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the DEQ, Fredericksburg Satellite Office within four daytime business hours, after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

If, for any reason, the affected facilities or related air pollution control equipment fails or malfunctions and may cause excess emissions for more than one hour, the owner shall notify the DEQ, Fredericksburg Satellite Office, within four (4) daytime business hours of the occurrence. In addition, the owner shall provide a written statement, within 14 days, explaining the problem, corrective action taken, and the estimated duration of the breakdown/shutdown.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit

termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Action for Cause

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
(9 VAC 5-80-110 G.4)

2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

   a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is potential of, a resulting emissions increase;

   b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;

   c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emissions cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;

   d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;

   e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;

   f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);

g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-355. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and

shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.

   d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, telegraph, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2.b to promptly report deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

(9 VAC 5-80-250)

V. Operation Reduction or Facility Shutdown

The permittee shall, upon request of the DEQ, reduce the level of operation at the facility if the board determines that this is necessary to prevent a violation of any primary ambient air quality standard. Under worst case conditions, the DEQ may order that the permittee shut down the facility, if there is no other method of operation to avoid a violation of the primary ambient air quality standard. The DEQ reserves the right to prescribe the method of determining if a facility will cause such a violation. In such cases, the facility shall not be returned to operation until it and the associated air

pollution control equipment are able to operate without violation of any primary ambient air quality standard.
(9 VAC 5-80-110, 9 VAC 5-20-180 I, and Condition 10 of 6/24/99 minor NSR permit)

W. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-260)

X. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

Y. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

X. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Emission Standards for Toxic Pollutants (9 VAC 5-40-160 through 9 VAC 5-40-230) and (9 VAC 5-50-160 through 9 VAC 5-50-230).

(9 VAC 5-80-110 N, Condition 6 of 6/24/99 minor NSR permit and 9 VAC 5-80-300)